

26 January 2006

I do not support the idea of fully deregulating the Amateur Service spectrum as proposed in RM-11305. The Amateur Radio spectrum is intended to support a broad range of communication activity and removing of mode subband allocations and segregation as proposed in this petition, will have a negative impact on narrow-band data/CW communications and experimentation. FCC rules and technical standards provide a basic and necessary framework needed to permit peaceful coexistence among a variety of different kinds of amateur radio operations. While specific rules and standards should change over time as operating practices and technical advancements occur, a basic framework which includes general mode subband allocations and guidelines should be maintained to ensure adequate and equitable access to the spectrum. The current subbands structure protects narrow-band (CW/Data) communications and various forms of experimentation from "unintentional" interference which would inevitably be a problem under this proposal.

I am particularly concerned with the idea, put forth in the introductory paragraph, of dynamically selecting a frequency from an entire range of frequencies available in a given band. This idea is inconsistent with any type of band planning and would certainly result in increase interference to narrow-band communications. The current misalignment of mode and frequency allocations on 40m across ITU regions provides a good illustration of the difficulty with various modes coexisting within a relatively narrow band of frequencies and the detrimental impact wide-band modes have on narrow-band communications. It is often difficult to find a clear frequency to conduct long haul CW/data communications on 40 meters due to congestion and interference from voice QSOs which have increasingly over time continued to routinely move closer and closer to the bottom edge of the band. This petition would create a similar situation across most of the Amateur Service HF spectrum that would not only negatively effect long haul communications but will also be detrimental to domestic narrow-band communications and experimentation. Other forms of experimentation such as low power/weak signal will also be negatively affected.

Some of the reasons given for proposed changes in the petition are antidotal, exaggerated, and unsupported. For example, the petition offers no evidence to support the claim that there is a "chronic need to allow greater leeway in selecting frequencies" particularly across the entire HF Amateur Radio spectrum. The statement that there is an "imbalance in our ability to use amateur allocations" does not make sense unless your arguing in favor of one mode over another and seems to ignore existing operating practices and

gentleman's agreements in which narrow-band modes congregate at the bottom portions of the bands while wide-band modes occupy the much larger portion of the top end of the band. And, I have serious doubts that the "progressive environment" being proposed will be conducive to "unintentional" interference free digital experimentation -- in fact I believe just the opposite will occur.

One of the petitions' key arguments is that "allocations don't match today's typical level of use." I believe the bandwidth occupancy study and report included in the petition did a poor job of demonstrating and quantifying band occupancy of a typical operating day. The test sample was way too small and random to form the basis for a factual conclusion and fails to consider important factors which are needed to assess peak band utilization. Restricting the data sample to only QSOs which involved at least one US amateur will clearly lead to an inaccurate characterization of true band occupancy which is important factor in assessing subband utilization. The 1.75:1 phone-to-CW ratio claimed by the study, is an average over time, and again not representative of peak hourly usage which is clearly important in assessing subband utilization, congestion, and the potential for interference.

Sincerely,

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